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April 8, 2021

*Via ECF*

Honorable P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl Street, Courtroom 11D  
New York, NY 10007

Re: *Dame Products v. The Metropolitan Transportation Authority, et al.*  
Case No. 19 Civ. 05649 (PKC)

Your Honor:

We represent Plaintiff Dame Products in the above-captioned matter. We write jointly with counsel for Defendants to respectfully request an extension of time from April 9, 2021 to April 30, 2021 for the parties to file pre-motion letters in anticipation of moving for summary judgment and an extension of time from April 30, 2021 to May 21, 2021 for the parties to complete expert discovery. One previous request for an extension of the pre-motion letter deadline was made and granted. *See* Dkt. No. 53. Two previous requests for an extension of the expert discovery deadline were made and granted. *See* Dkt. Nos. 38-39, 40, 42. The next Court conference is scheduled for April 26, 2021.

The parties request these extensions because they have continued to engage in substantive and progressing settlement discussions. To date, the parties have each exchanged settlement proposals and counter-proposals, which continue to require both parties' attention. The parties believe it would be more productive and efficient to devote resources to furthering settlement negotiation than to expend time and resources on conducting expert depositions and preparing papers regarding possible summary judgment motions. The parties propose to update the Court on the status of settlement negotiations and remaining discovery on April 30, 2021.

[ For the foregoing reasons, the parties respectfully request that the Court extend the deadline to file pre-motion letters in anticipation of moving for summary judgment from

*Application*  
*GRANTED. Conference*  
*adjourned from*  
*April 26 to*  
*May 24, 2021 at 12:30pm*  
*SO ORDERED*  
*[Signature]*  
*USDJ*  
*4-13-21*

*OK*

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April 9, 2021 to April 30, 2021 and the deadline to complete expert discovery from April 30, 2021 to May 21, 2021. |

Respectfully submitted,

/s

Richard D. Emery  
Samuel Shapiro  
Emma L. Freeman

c. All counsel of record, *via ECF*